



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

May 30, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.  
de maximis, inc.  
186 Center Street, Suite 290  
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –  
Administrative Settlement Agreement and Order on Consent for Remedial  
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the Draft Remedial Investigation (RI) Report Section 9 and Appendix K, prepared by Anchor QEA on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area Remedial Investigation/Feasibility Study. Section 9 and Appendix K are dated December 29, 2017.

The comments for Section 9 and Appendix K are attached, with one comment presented on Section 9 and the remaining comments focused on Appendix K. Also, the CPG submitted Appendix Z and referred to Appendix Z in the RI. During the review of the RI, CDM Smith recognized Appendix Z should be labeled Appendix K and reviewed the document as Appendix K. Please proceed with revisions to the draft RI Report consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in blue ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager  
Lower Passaic River Study Area RI/FS

Enclosure

Cc: Zizila, F. (EPA)  
Sivak, M. (EPA)  
Hyatt, B. (CPG)  
Otto, W. (CPG)

**EPA COMMENTS**

**Lower Passaic River Study Area Remedial Investigation/Feasibility Study, Remedial Investigation Report Sections 9 and Appendix K**

No.	Section	General or Specific	Page/Figure No.	EPA Comment
1	Section 9	General	N/A	Please revise Section 9 to be consistent with the final BERA once EPA comments on the BERA are incorporated.
2	Appendix K	General	All Figures	Some core samples appear to be located beyond the river's boundary (e.g., the orange core on Figure 1-1a). However, based on previous conversations with the CPG, it is EPA's understanding that these cores only <i>appear</i> to be located beyond the bank of the river, and that such cores were collected at a depth shallower than the last bathymetry line causing them to appear to exist in open space. To remedy any confusion, the river bank boundary should be added to the figures, and core locations should be verified to fall within the river bank boundary. Please also verify that cores collected within the mouths of tributaries are accurately presented.
3	Appendix K	General	All Figures	Please provide a note or clarifying text as to over what time period ">1.5 feet of Erosion" in the legend was measured. Also, for figure clarity, these areas should be represented with some type of hatching to better distinguish them from areas where no bathymetric data exist.
4	Appendix K	General	All Figures	Regarding the "Bathymetric Change Category" in the legend: <ul style="list-style-type: none"> <li>• Please add another classification to denote those areas where no bathymetric data are currently available</li> <li>• As noted in Comment #31 of the Sections 1 to 4 comment set, please either reclassify the last grouping as "No Change/Temporarily Depositional or Erosional", or clarify why "temporarily erosional" (e.g., regions that experienced measured erosion of less than 6 inches) are not be included in this category.</li> </ul>
5	Appendix K	General	All Figures	Please add the numeric value of a few of the bathymetric contours on each map for reference purposes (e.g., values for 5 ft and 10 ft bathymetric contours)
6	Appendix K	General	All Figures	The sediment cores depicted on the figures present sediment concentrations from only the upper two depth intervals (0 – 0.5 feet and 0.5 to 1.5 feet). For completeness and to facilitate evaluation of the impact of sediment erosion and deposition, please present all depth intervals available. For example, Section 4 Figure 4.2.3-11a shows additional depths for cores CLRC-079 and CLRC-080 (to 5.5 feet) that are not shown Figure 1-1a of Appendix K.
7	Appendix K	General	N/A	Any changes made to figures in Appendix K should be reflected in similar Section 4 figures (e.g. Figure 4.2.3-7, Figure 4.2.4-7, Figure 4.2.5-18, and Figure 4.2.6-13).

**EPA COMMENTS**

**Lower Passaic River Study Area Remedial Investigation/Feasibility Study, Remedial Investigation Report Sections 9 and Appendix K**

<b>No.</b>	<b>Section</b>	<b>General or Specific</b>	<b>Page/Figure No.</b>	<b>EPA Comment</b>
8	Appendix K	Specific	2-7e (as an example)	The core information on the minimized aerial view call-out box in the top right of the figure legend does not always seem to match the surface core information presented on the larger “fly-through” surface. Please add a note on these figures explaining why this is (or appears to be).
9	Appendix K	Specific	1-6e (as an example)	The southernmost core appears to be located on the bridge abutment. Please verify the location of this core. A similar issue (core on an abutment) also exists on Figures 1-6f, 2-6e, 2-6f, 3-6e, 3-6f, 4-6e, 4-6f, 5-6e, 5-6f

N/A – not applicable